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VIA ECF

The Honorable Joan M. Azrack
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Gathmann-Landini and Andrade v. lululemon usa inc.*,
Case No.: 2:15-cv-06867 (JMA)(AYS)

Dear Judge Azrack:

This firm represents defendant lululemon usa inc. ("defendant" or "lululemon") in the above-referenced matter. This letter is submitted jointly with plaintiffs.

The parties write to respectfully request a two-week extension of time for plaintiffs to submit their motion to remand and for defendant to submit its motion to dismiss and/or strike. In advance of these motions, the parties have agreed to exchange certain information and documents which could moot some or all of the issues to be raised in these applications.

As part of this process, lululemon is gathering arbitration agreements between it and many of the putative class members. However, many older agreements exist only as hard copy documents and are stored locally at various stores and/or regional facilities throughout New York State. As a result, while defendant has attempted in earnest to collect this information expediently, the process is taking longer than anticipated. The additional time requested herein will permit defendant to sufficiently complete this process, with the results potentially negating the need for either party's motion.

This is the parties' second request for extension. The original briefing schedule provided for moving papers to be served by February 26, 2016, responses by March 18, 2016, and replies by April 1, 2016. The court previously granted the parties' request for a two-week extension on these dates. Pursuant to the present request, the new briefing schedule would modify these dates to March 25, 2016 for moving papers, April 15, 2016 for responses, and April 29, 2016 for replies. No other Court established dates will be affected by this request.



We thank Your Honor for your attention to this matter.

Respectfully submitted,

Garrett D. Kennedy

cc: Kara S. Miller (counsel for plaintiffs)
David H. Rosenberg (counsel for plaintiffs)